

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

PLAINTIFF,

VS.

PIERRE DUVON BOYD,

DEFENDANT.

)  
)  
)  
)  
) CRIMINAL NO.: 05-22 Erie

**) TYPE OF PLEADING:**

) MOTION TO CONTINUE  
 ) SENTENCING HEARING

**) FILED ON BEHALF OF:**

) PIERRE DUVON BOYD  
)  
) DEFENDANT

**) ATTORNEY OF RECORD:**

) ADAM B. COGAN, ESQUIRE  
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) GREENSBURG, PA 15601

) (724) 837-9046

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UNITED STATES OF AMERICA,	)	
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VS.	)	CRIMINAL NO.: 05-22 Erie
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PIERRE DUVON BOYD	)	
	)	
DEFENDANT.	)	

**MOTION TO CONTINUE SENTENCING HEARING**

AND NOW, comes the Defendant, PIERRE DUVON BOYD, by counsel, ADAM B. COGAN, ESQUIRE, and respectfully requests that this Honorable Court enter an Order continuing the scheduled sentencing hearing in this matter. In support thereof, the following is respectfully averred:

1. The Defendant's sentencing is presently set for November 30, 2005.
2. The Defendant's plea agreement contains Section 5K1.1/Rule 35(b) language and, pursuant to consultation with the Assistant United States Attorney Marshall Piccinini, it is believed and, therefore respectfully averred that the ends of justice would be served if sentencing in this matter were deferred 90 days to allow the Defendant to fulfill this term of his plea agreement.
3. Counsel for the United States, Marshall Piccinini, has therefore consented to this contemplated continuance.

WHEREFORE, it is respectfully requested that the sentencing hearing in this matter be continued 90 days to allow the Defendant to fulfill the terms of his plea agreement.

RESPECTFULLY SUBMITTED,

s/Adam B. Cogan  
ADAM B. COGAN, ESQUIRE